

REMARKS

In the outstanding Office Action, the Examiner: (i) rejects claims 1, 13, 25 and 26 under U.S.C. §112, first and second paragraphs; (ii) rejects claims 1, 3, 13, 15, 25 and 26 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,161,136 (hereinafter “Hyndman”); and (iii) rejects claims 2, 4-12, 14 and 16-24 under 35 U.S.C. §103(a) as being unpatentable over Hyndman in view of U.S. Patent No. 5,768,510 (hereinafter “Gish”).

In this response, Applicants: (i) amend independent claims 1, 13, 25 and 26; and (ii) respectfully traverse the §112, §102 and §103 rejection of claims 1-26.

Regarding the §112, first paragraph rejection of claims 1, 13, 25 and 26, Applicants have amended the claims to address the alleged problem. The limitation now reads “further wherein the client and the server both locally maintain at least a portion of the respective model and execute the view-generating and controller logic associated therewith.” This is illustratively shown in FIG. 3 and the specification at page 8, lines 8-17 of the present specification. The web server 5000 comprises Model-View-Controller components, including server-side View-generating logic 5400, server-side Model data 5600 and server-side Controller logic 5800, allowing for the server to locally maintain at least a portion of the respective model and execute the view-generating and controller logic associated therewith. The web browser (client) 1000 comprises a user-interaction window 1200, client-side View-generating logic 1400, client-side Model data 1600 and client-side Controller logic 1800, allowing for the client to locally maintain at least a portion of the respective model and execute the view-generating and controller logic associated therewith.

Regarding the §112, second paragraph rejection of claims 1, 13, 25 and 26, the claims have been amended to overcome the rejection.

Accordingly, the various §112 rejections should be withdrawn.

Regarding the §102(e) rejection of claims 1, 3, 13, 15, 25 and 26, the Office Action contends that Hyndman discloses all of the claim limitations recited in the subject claims. Applicants respectfully assert that Hyndman fails to teach or suggest all of the limitations in claims 1, 3, 13, 15, 25 and 26, for at least the reasons presented below.

It is well-established law that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.

*Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). Applicants assert that the rejection based on Hyndman does not meet this basic legal requirement, as will be explained below.

The claimed invention, as recited in independent claim 1, provides a method for use in a client/server system of reducing interactions between a client and server in association with an application being accessed by the client at the server. The method comprises the steps of: configuring the server to store a model associated with the application and to execute view-generating and controller logic associated with the application; and configuring the client to store at least a subset of the model associated with the application and to execute at least a subset of the view-generating and controller logic associated with the application; wherein one or more portions of the application are performed at the client without the client having to interact with the server, and further wherein the client and the server both locally maintain at least a portion of the model and execute the view-generating and controller logic associated therewith. Independent claims 13, 25 and 26 recite similar limitations.

As explained on page 3, lines 22-27, of the present specification: “[t]he invention addresses performance by employing a dual-MVC approach, in which a subset of the application’s Model-View-Controller reside on the client, and the full Model-View-Controller and View-Generating-Logic reside on the server, thereby reducing the number of required server interactions.” FIG. 3 of the present application illustrates such an inventive dual-MVC approach.

Thus, the claimed invention recites that the server “store[s] a model associated with the application and maintain[s] view-generating and controller logic associated with the application,” and the client “store[s] at least a subset of the model associated with the application and maintain[s] at least a subset of the view-generating and controller logic associated with the application.”

While Hyndman discloses a multilevel model-view-controller (MMVC), Hyndman does not disclose the dual-MVC approach of the claimed invention. That is, among other deficiencies, Hyndman does not disclose having a server to store and maintain a model associated with the application and to execute view-generating and controller logic associated with the application, and having a client to store and maintain at least a subset of the model associated with the application

and to execute at least a subset of the view-generating and controller logic associated with the application.

The Office Action relies on Hyndman at column 2, lines 40-49, which states the following with emphasis supplied:

According to a further aspect of the invention, there is provided a method of structuring functionality of a user interface for a network management system of a communication network into a multilayered model-view-controller pattern, comprising separating the user interface into a server and a client layer integrating the state information on the server in a high-level model, integrating the state information on the client layer as a high-level view, and integrating a data marshalling mechanism provided by the network management system as a high-level controller.

The Office Action also relies on Hyndman at column 3 line 59-64, which states the following with emphasis supplied:

At the high level, the two parts of the user interface according to the invention, namely the UIC and UIS, follow this MVC pattern. The UIS state information forms the model, denoted with M, and the data marshalling mechanism is the controller, denoted with C, and the view is the UIC portion of the interface, denoted with V.

FIG. 1B illustrates the next level of the MMVC architecture according to the invention. For example, MVC-1, comprising view V-1, model M-1 and controller C-1, is the view V-2 for the next level MVC-2. MVC-2, comprising view V-2, model M-2 and controller C-2, is the view V2 for the next level MVC-3. This continues until the finest granularity for any given system.

If the MMVC pattern is applied to the structure shown in FIG. 1B, at a high level, the view V-2 of the MVC-2 is the UIC state information, the model M-2 is the UIS and the controller C-2 is the data marshalling mechanism for the various applications provided in the MN.

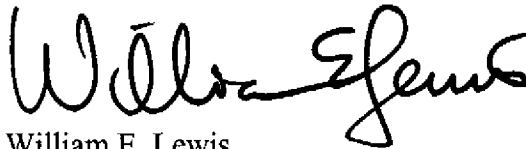
Accordingly, Applicants assert that independent claims 1, 13, 25 and 26, as well as the claims which depend therefrom, are patentable over Hyndman and therefore allowable. Such dependent claims also recite patentable subject matter in their own right.

Regarding the §103(a) rejections to claims 2, 4-12, 14 and 16-24, Applicants respectfully assert that such dependent claims are patentable over the Hyndman/Gish combination for at least the reasons given above with respect to independent claims 1 and 13. Gish fails to remedy the

deficiencies of Hyndman. However, Applicants also assert that such dependent claims also recite patentable subject matter in their own right.

In view of the above, Applicants believe that claims 1-26 are in condition for allowance, and respectfully request withdrawal of the §112, §102 and §103 rejections.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William E. Lewis". The signature is fluid and cursive, with the first name "William" being the most prominent part.

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